Case 1:21-cy-01957-KHP Document 20 Filed 06/28/22 Page 1 of 1

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:\_\_\_\_
DATE FILED:\_\_06/28/2022\_

CHRISTOPHER J. BOWES, ESQ. 54 Cobblestone Drive Shoreham, NY 11786
Tel. (212) 979-7575
Fax (631) 929-1700
cjbowes@gmail.com

June 27, 2022

Via ECF Hon. Katharine H. Parker United States Courthouse 500 Pearl Street New York, New York 10007 APPLICATION GRANTED

Kathaun +

Hon. Katharine H. Parker, U.S.M.J.

Re: <u>Torres v. Kijakazi</u> 1:21-cv-1957 (KHP) 06/28/2022

Dear Judge Parker:

I am the attorney for the plaintiff in the above captioned case, I am writing to request a revision to the briefing schedule in this case. Pursuant to the January 10, 2022 Scheduling Order (Docket #12), the Court directed the Commissioner to prepare her version of the Joint Stipulation within 90 days from the filing of the administrative record (filed on March 14, 2022).

I filed my Notice of Appearance before the Court on May 3, 2022. In discussion with AUSA Joseph Pantoja, we agree that in a case where the claimant is represented, the burden to move first normally should have reverted to the plaintiff, and I should have prepared plaintiff's draft of the Joint Stipulation by June 13, 2022.

Regrettably, my office did not calendar this case correctly, and I have not yet submitted Plaintiff's Joint Stipulation to the Commissioner. With the consent of opposing counsel, we respectfully request that the Court approve and adopt the following revised briefings schedule:

July 13, 2022 Plaintiff's Joint Stipulation to Defendant
August 26, 2022 Defendant's Joint Stipulation to Plaintiff

September 9, 2022 Plaintiff Reply/Final Draft of Joint Stip. To Defendant

September 16, 2022 Joint Stipulation filed with Court

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

<u>Christopher J. Bowes, Esq.</u> Christopher J. Bowes, Esq.

Cc: AUSA Joseph Pantoja